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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE PROPOSED CHANGES)
AND ADJUSTMENTS TO THE POWER COST) CASE NO. AVU-E-00-6
ADJUSTMENT (PCA) METHODOLOGY OF)
AVISTA CORPORATION (REFERENCE ORDER) COMMENTS OF THE
NO. 28402).) COMMISSION STAFF
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COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Scott Woodbury, Deputy Attorney General, and in response to the Notice of Modified Procedure and Notice of Comment/Protest Deadline, Order No. 28582, issued on December 14, 2000, submits the following comments.

On June 13, 2000, the Idaho Public Utilities Commission (Commission) in Order No. 28409 initiated Case No. AVU-E-00-06 to examine proposed changes and adjustments to the PCA methodology of Avista Corporation dba Avista Utilities (Company). Order No. 28453 required the Commission Staff and Company to file initial statements of position by August 4, 2000, which was done. No other parties intervened. On October 30, 2000, Avista filed an Agreement that changed its initial position and adopted Staff's initial position with the exception of the date on which Rathdrum is to first be included. Staff proposed September 1, 2000, but has

since agreed to November 1, 2000. Staff stands by the remainder of its comments as filed in its
“Initial Statement of Position.”

RESPECTFULLY submitted this day of December 2000.

Scott Woodbury
Deputy Attorney General

Technical Staff: Keith Hessing

SW:KH:gdk:i:umisc/comments/avue006.swkh